

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida
03 CV 06978 (RCC)

**THE FEDERAL INSURANCE PLAINTIFFS' MORE DEFINITE STATEMENT
AND SUPPLEMENTAL PLEADING ADDING CERTAIN DEFENDANTS
PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 12(e) AND
15(d) AND PARAGRAPH 12 OF CASE MANAGEMENT ORDER #2**

1. As identified in the *Federal* plaintiffs' First Amended Complaint, defendant "al Haramain a/k/a al Haramain Foundation" refers to and includes the al Haramain Foundation of Saudi Arabia, as well as any and all subsidiary or branch offices thereof, including without limitation, all of the following, each of whom has been and is identified as a defendant herein:

- a. Al Haramain Islamic Foundation (Saudi Arabia)
- b. Al Haramain Islamic Foundation (Afghanistan)
- c. Al Haramain Islamic Foundation (Albania)
- d. Al Haramain Islamic Foundation (Bangladesh)
- e. Al Haramain Islamic Foundation (Bosnia-Herzegovina)
- f. Al Haramain Islamic Foundation (Ethiopia)
- g. Al Haramain Islamic Foundation (Indonesia)
- h. Al Haramain Islamic Foundation (Kenya)
- i. Al Haramain Islamic Foundation (Netherlands)
- j. Al Haramain Islamic Foundation (Pakistan)

- k. Al Haramain Islamic Foundation (Somalia)
- l. Al Haramain Islamic Foundation (Tanzania)
- m. Al Haramain Islamic Foundation (United States)

2. As identified in the *Federal* plaintiffs' First Amended Complaint, defendants "Muslim World League" and "Muslim World League Offices" refer to and include the Muslim World League of Saudi Arabia, as well as any subsidiary or branch offices thereof, including without limitation, all of the following, each of whom has been and is identified as a defendant herein:

- a. Muslim World League (Buenos Aires, Argentina)
- b. Muslim World League (Preston, Australia)
- c. Muslim World League (Vienna, Austria)
- d. Muslim World League (Dhaka, Bangladesh)
- e. Muslim World League (Bujumbura, Burundi)
- f. Muslim World League (Etobicoke, Canada)
- g. Muslim World League (Moroni, Comores)
- h. Muslim World League (Brazzaville, Congo)
- i. Muslim World League (Kobenhaven, Denmark)
- j. Muslim World League (Mantes la Joile, France)
- k. Muslim World League (Libreville, Gabon)
- l. Muslim World League (Jakarta, Indonesia)
- m. Muslim World League (Rome, Italy)
- n. Muslim World League (Amman, Jordan)
- o. Muslim World League (Nairobi, Kenya)
- p. Muslim World League (Kuala Lumpur, Malaysia)

- q. Muslim World League (Nouakchott, Mauritania)
- r. Muslim World League (Mauritius, Mauritius)
- s. Muslim World League (Maputo, Mozambique)
- t. Muslim World League (Wuse Abuja, Nigeria)
- u. Muslim World League (Islamabad, Pakistan)
- v. Muslim World League (Makati City, Philippines)
- w. Muslim World League (Male, Republic of Maldives)
- x. Muslim World League (Moscow, Russia)
- y. Muslim World League (Makkah, Saudi Arabia)
- z. Muslim World League (Dakar, Senegal)
- aa. Muslim World League (Djibouti, Somalia)
- bb. Muslim World League (Gauteng, South Africa)
- cc. Muslim World League (Khartoum, Sudan)
- dd. Muslim World League (Dar Es Salaam, Tanzania)
- ee. Muslim World League (Bangkok, Thailand)
- ff. Muslim World League (Lome, Togo)
- gg. Muslim World League (Port of Spain, Trinidad)
- hh. Muslim World League (London, U.K.)
- ii. Muslim World League (Kampala, Uganda)
- jj. Muslim World League (New York, U.S.A.)
- kk. Muslim World League (Falls Church, U.S.A.)

3. As identified in the *Federal* plaintiffs' First Amended Complaint, defendant "World Assembly of Muslim Youth" refers to and includes World Assembly of Muslim Youth of Saudi Arabia, as well as any and all subsidiary or branch offices thereof, including without limitation, all of the following, each of whom has been and is identified as a defendant herein:

- a. World Assembly of Muslim Youth (Riyadh, Saudi Arabia)
- b. World Assembly of Muslim Youth (Jeddah, Saudi Arabia)
- c. World Assembly of Muslim Youth (London, United Kingdom)
- d. World Assembly of Muslim Youth (Falls Church, Virginia)

4. As identified in the *Federal* plaintiffs' First Amended Complaint, defendant "International Islamic Relief Organization" refers to and includes International Islamic Relief Organization of Saudi Arabia, as well as any and all subsidiary or branch offices thereof, including without limitation, all of the following, each of whom has been and is identified as a defendant herein:

- a. International Islamic Relief Organization (Saudi Arabia)
- b. International Islamic Relief Organization branch offices in Africa, Asia, Europe, Canada, the United States of America, Latin America, and the Caribbean.

5. As identified in the *Federal* plaintiffs' First Amended Complaint, defendant "Taibah International Aide Association" refers to and includes The Taibah International Aide Association of the United States, and The Taibah International Aide Association of Bosnia-Herzegovina.

6. As identified in the *Federal* plaintiffs' First Amended Complaint, defendant "Benevolence International Foundation" refers to and includes Benevolence International Foundation of Saudi Arabia, as well as any and all subsidiary or branch offices thereof, including without limitation, all of the following, each of whom has been and is identified as a defendant herein:

- a. Benevolence International Foundation (Bosnia-Herzegovina)
- b. Benevolence International Foundation (Canada)

- c. Benevolence International Foundation (Saudi Arabia)
- d. Benevolence International Foundation (United States)

7. Additional defendant Saudi Commission for Relief and Charity Abroad is an agency, instrumentality and/or organ of the Kingdom of Saudi Arabia, and the successor in interest to numerous Saudi charities dissolved due to their extensive involvement in sponsoring al Qaida, including, without limitation, al Haramain Foundation, Waqf Foundation, Benevolence International Foundation, Saudi Joint Relief Committee and Saudi High Commission.

Dated: September 10, 2004

Respectfully submitted,

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